

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 3rd Filing to Implement) File No. EO-2018-0211
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA.)

CLARIFICATION OF TARIFF AND NOTIFICATION FILINGS

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and provides this clarification of its recent filings in light of the Missouri Public Service Commission's ("Commission") *Order Directing Staff Recommendation* issued February 14, 2020. In support of its position, Ameren Missouri states as follows:

1. On February 7, 2020, Ameren Missouri submitted a tariff revision in Tracking No. YE-2020-0136 in order to expand language that was restricting a broader implementation of one of its programs. On February 13, 2020, Ameren Missouri submitted a *Notification* of certain program modifications that were vetted through the 11-Step Change Process as allowed by its MEEIA tariffs at Sheet No. 221.4. Because both matters involved revisions to the Residential Single Family Low-Income program and were filed in close proximity to another, Ameren Missouri fears it has caused unneeded confusion between the two matters. Below, the Company explains why these matters are indeed separate, and why neither filing requires a Commission order to be issued in File No. EO-2018-0211.

YE-2020-0136 – Tariff Filing

2. On February 7, 2020, Ameren Missouri submitted a tariff filing in Tracking No. YE-2020-0136. The Company made this filing in order to modify a tariff provision that otherwise restricts the applicability of its Residential Single Family Low-Income program. The tariff has previously placed a limit on the size of certain structures that could be considered

single-family dwellings, which had been preventing broader application of the program. Because the restricting parameters were contained in the tariff itself, they could only be broadened with a tariff change. Specifically, the tariff currently in effect reads, at Sheet No. 242, that the program is available during the program period to:

Qualifying single family low-income customers receiving service under the Residential Service Rate 1(M) residing in single family detached housing, duplexes, and mobile homes (wood-frame bolted to steel chassis, designed to be transported)...

The revised tariff language found in Tracking No. YE-2020-0136 revises that language to read:

Qualifying single family low-income customers receiving service under the Residential Service Rate 1(M) residing in single family detached housing, attached dwellings of four (4) or fewer units, and mobile homes (wood-frame bolted to steel chassis, designed to be transported)...

Because of the nature of this tariff change, Ameren Missouri felt it could be accomplished via a typical tariff revision rather than as a docketed tariff matter. The expansion of eligibility to single family residences from duplexes to attached dwellings of up to four units was the only substantive revision to the tariff.

3. Although not required, Ameren Missouri provided information similar to step 5 in the 11-Step Change Process, as described below, to Commission's Staff, the Office of the Public Counsel, and the Missouri Department of Natural Resources – Division of Energy.¹ No one objected to the tariff revision.

EO-2018-0211 – 11-Step Change Process

4. Subsequently, on February 13, 2020, the Company made several revisions to various residential programs that remained within the parameters established by its filed and approved MEEIA tariffs, and reflected "changes in a program detail regarding the interaction

¹ The Division of Energy was formerly part of the Missouri Department of Economic Development, and is reflected as such in Ameren Missouri's tariffs until an opportunity arises to correct this.

between the Company or Program Administrators and customers participating in the programs," as anticipated by the 11-Step Change Process reflected in tariff Sheet No. 221.4. Among these changes were certain revisions to incentives available to residential income eligible single family customers, although the program changes were not limited to these customers.

5. In order to effectuate those program changes, Ameren Missouri followed the 11 steps outlined in the tariff, including step 5:

Inform the Staff, Office of the Public Counsel, and the Missouri Department of Economic Development – Division of Energy (DE) of the proposed change, the time within which it needs to be implemented, provide them the analysis that was done and consider recommendations from them that are received within the implementation timeline (the implementation timeline shall be no less than five business days from the time that the Staff, Office of the Public Counsel, and the DE are informed and provided the above-referenced analysis)...

It is worth noting that the Company did not receive any objections to these proposed changes. Subsequent to providing this notification and analysis, the 11-Step Change Process also requires the Company, at step 10, to "File updated web pages and, if appropriate, updated list of Measures and Incentive amounts in File No. 2018-0211." The February 13, 2020 *Notification* was provided pursuant to this step. This *Notification* does not require any Commission action for the program revisions to become effective.

6. The program changes described in the *Notification* did not require tariff language revisions, but instead reflected changes in how certain interactions were accomplished within the MEEIA tariffs' terms.

Conclusion

7. The Company suggests that the tariff submitted in Tracking No. YE-2020-0136 and the *Notification* submitted in File No. EO-2018-0211 address two separate aspects of Ameren Missouri's income eligible single family MEEIA programs. These separate aspects need not be combined for the purposes of any Commission action.

WHEREFORE, Ameren Missouri respectfully submits this *Clarification of Tariff and Notification Filings* for the Commission's information.

Respectfully submitted,

/s/ Paula N. Johnson

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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed to counsel of record in this case on this 19th day of February, 2020.

/s/ Paula N. Johnson

Paula N. Johnson